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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

DAVID GILBERT SAFFRON  
a/k/a DAVID GILBERT and  
CIRCLE SOCIETY, CORP.,

Defendant.

Case No. 2:19-cv-1697-JAD-DJA

**PLAINTIFF'S PROOF OF SERVICE BY  
PUBLICATION ON DEFENDANT DAVID  
SAFFRON**

Pursuant to the Court's Order dated October 30, 2019 ("Alternative Service Order," ECF No. 19) and in accordance with Nev. R. Civ. P. 4.4(c), Plaintiff Commodity Futures Trading Commission ("Plaintiff") hereby submits this Proof of Service informing the Court that Plaintiff served the Summons and Complaint on Defendant David Saffron ("Saffron") by publication once a week for a period of four weeks.

Plaintiff accomplished service of process on Saffron by:

1. Publishing the following information in the *Las Vegas Review Journal* and *Los Angeles Daily News*: (1) Notification of the Summons and a statement describing how a copy of the Summons, Complaint, and other filings, may be obtained ("Notification"); and (2) Language of the Summons and a brief summary of the

claims asserted and the relief sought (“Additional Language”). *See* Alternative Service Order, ECF No. 19; Nev. R. Civ. P. 4.4(c)(2)(C).

Attached as Exhibit 1 to this Proof of Service is an affidavit prepared by the Legal Clerk of the *Las Vegas Review Journal*, confirming that the newspaper published the Notification and Additional Language on November 1, 2019; November 8, 2019; November 15, 2019; and November 22, 2019. Attached as Exhibit 2 to this Proof of Service is an affidavit prepared by the Principal Clerk of the *Los Angeles Daily News*, confirming that the newspaper published the Notification and Additional Language on November 1, 2019; November 8, 2019; November 15, 2019; and November 22, 2019.

2. Mailing the following via United Parcel Service (“UPS”) overnight delivery to Saffron’s last-known address in Las Vegas, Nevada on October 31, 2019: (1) Complaint (ECF No.1); and (2) Signed Summons (ECF Nos. 4,10).<sup>1</sup> Attached as Exhibit 3 to this Proof of Service is the UPS Proof of Delivery (confirming delivery on November 1, 2019).

Pursuant to Nev. R. Civ. P. 4.4(c)(4)(C), Plaintiff’s service by publication is complete four weeks from “the date of the first publication.” The date of the first publication in both the *Las Vegas Review Journal* and *Los Angeles Daily News* newspapers was November 1, 2019. Therefore, service by publication on Defendant Saffron is complete as of November 29, 2019.

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<sup>1</sup> With the Complaint and Summons, Plaintiff also served its Motion for Alternative Service of Process on Defendant David Saffron and Memorandum in Support (ECF No. 16), and Order Granting Plaintiff’s Motion for Alternative Service of Process on Defendant David Saffron (ECF No. 19).

1 Dated: November 29, 2019

Respectfully submitted,

2 By: /s/ Danielle E. Karst  
3 Danielle E. Karst  
4 Timothy J. Mulreany  
5 **COMMODITY FUTURES TRADING**  
6 **COMMISSION**  
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**CERTIFICATE OF SERVICE**

I certify that on November 29, 2019, I filed a copy of the foregoing *Plaintiff's Proof of Service by Publication on Defendant David Saffron* with the Clerk of the Court using the CM/ECF system. I also certify that on November 29, 2019, I sent hard copies of the same to Defendants David Gilbert Saffron and Circle Society, Corp. via United Parcel Service overnight mail at the following addresses:

**David Gilbert Saffron**

[REDACTED]  
Las Vegas, Nevada [REDACTED]  
(*Last-Known Address*)

**Circle Society, Corp.**

c/o Michael C. Van, Esq.  
8985 S. Eastern Ave., Suite 100  
Las Vegas, NV 89123

/s/Danielle Karst

Danielle Karst